

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

NO. 3:21-CR-0054-N

v.

DANIEL REY SETTLE
a.k.a. "POLO"

**GOVERNMENT'S NOTICE OF EXPERT WITNESSES AND REQUEST FOR
NOTICE OF DEFENSE EXPERT WITNESSES**

The United States of America (the "government") hereby files its Notice of Expert Witnesses and Request for Notice of Defense Expert Witnesses:

Government's Notice of Expert Witnesses

1. Dr. Shannon Wolf

B.H. Carroll Theological Institute
Irving, Texas

Dr. Shannon Wolf is an expert in psychology and counseling, with a focus on trauma and care for trafficking and sexual assault victims. Since 2016, she has served as the Associate Director of Counseling Program and as a Professor of Psychology and Counseling at B.H. Carroll Theological Institute. Additionally, she has served as a Director at Southcliff Christian Counseling Center since 2003.

Dr. Wolf holds a Doctorate Degree in Psychology and Counseling, as well as a Master of Arts Degree in Marriage and Family Counseling, from Southwestern Baptist Theological Seminary. She has been a Licensed Professional Counselor since 2003 and a Licensed Professional Counselor Approved Supervisor since 2009. From 2008 through

2016, she served as a Professor of Master of Arts in Counseling at Dallas Baptist University, where she taught psychology and counseling courses to master's level students.

Since 2019, she has served on the Board of Directors for Unbound, a non-profit organization aimed at combatting human trafficking. Additionally, from 2012 to 2017, Dr. Wolf served on a Texas Attorney General Task Force to develop standards of care for organizations offering safe homes or services for victims of human trafficking. She also served as a Consultant for Traffick911, another non-profit organization that works to prevent sex trafficking, from 2010 to 2013. Further, Dr. Wolf provided consulting for the Homeland Security Task Force for Human Trafficking from 2013 to 2016. Dr. Wolf has counseled hundreds of human-trafficking victims.

Dr. Wolf has given numerous presentations on sex trafficking and sexual assault and the impact on victims. Likewise, she has authored numerous publications, which are listed on pages 13-14 of her curriculum vita, which is attached as Exhibit A. In addition to those works, she also published works titled, "The Sacred Act of Reconciliation" and "Not Easily Broken: Trauma Bonds and the Road to Healing."

Further, she has testified as an expert in several criminal trials. In the past four years specifically, she has testified as an expert in the following trials:

- *State of Texas v. Kerry Evans* (Woodville, Tyler County, Texas)
- *State of Texas v. Otis Lang* (Fort Worth, Tarrant County, Texas)
- *United States v. Alif Jan Adil* (Eastern District of Virginia)
- *United States v. Moises Zelaya-Veliz et al.* (Eastern District of Virginia)

- *United States v. William Adam Jonathan Smith* (Northern District of Texas)
- *United States v. Dkyle Bridges et al.* (Eastern District of Pennsylvania)
- *United States v. Michael Lowe* (Middle District of Alabama)
- *United States v. Pierre Lagrone et al.* (Northern District of Texas)

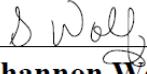
In this case, she is expected to testify about her educational and professional background, specifically regarding her clinical, practical, and academic work with trauma, sex trafficking, and sexual assault victims. She is also expected to testify, based on her training, experience, and education, regarding:

- the impact of sex trafficking on victims including, among others: experiencing trauma both during and after being trafficked; becoming severely depressed and/or angry; a dramatic change in victim's behavior following being trafficked, such as an inability to trust people, being unable to sleep/having nightmares, weight loss or gain, and a persistent feeling of being unsafe and long-term shame and guilt about what happened;
- the methods of psychological control and manipulation traffickers use over their victims to ensure compliance, including, among others: initially identifying and filling a need in the potential victim, such as the need for a father figure or the need to feel loved; sleep deprivation; sex; violence; and false promises;
- sex traffickers' common use of threats and coercion to obtain compliance, such as by beating up another girl to scare the victim and threatening the victim's family;
- why victims continue to engage in commercial sex acts when they do not want to, such as in order to appease their traffickers and ensure a sense of belonging among the "family" of the trafficker;
- how victims may respond to sex trafficking trauma in multiple ways, including fight, flight, freeze, or submit;
- how victims do not usually run away the first chance they get due to a trauma bond (a type of defense mechanism) with the trafficker;

- why sex-trafficking victims have difficulty making an outcry for help;
- how it is common for some victims to believe they love their trafficker;
- how some victims feel loyalty to the trafficker even after the trafficker has coerced them to engage in commercial sex acts, sometimes over extended periods of time;
- how it is rare for trafficking victims to immediately outcry to law enforcement or make an outcry to another individual, due to deep shame, guilt, and a sense of loyalty due the trafficker;
- how traffickers often identify potential victims, including by looking for someone that appears (among other characteristics) easy to control or has a characteristic or need the trafficker can exploit, such as a drug addiction, a need for shelter, a need for family, or a need for a boyfriend;
- how it is common for victims to—at least initially—go with traffickers willingly based on the draw of a fulfilled need or the promise of love;
- the common traits of sex-trafficking victims, including: history of past sexual assault/abuse; lack of strong relationships with parents (and especially fathers); an unstable home life; lacking a sense of self; a deep desire for love; and a weakened capacity to remove themselves from the situation; and
- how different victims present different demeanors when relaying their experiences being trafficked (some may appear tough, some cry, etc.).

[No further information on this page.]

A statement of Dr. Wolf's qualifications is attached hereto as Exhibit A. Below, Dr. Wolf has provided her signature to indicate that she has reviewed the above statement.



Dr. Shannon Wolf

2. Special Agent John Kochan¹
Homeland Security Investigations
Dallas, Texas

Special Agent John Kochan is a case agent and an expert in human trafficking terminology, tools, and methods. SA Kochan has been a Special Agent with the Department of Homeland Security (DHS) – Homeland Security Investigations (HSI) since 2009. During his time at HSI, SA Kochan spent six years investigating gangs and violent crime—including human trafficking—in Baltimore, Maryland. From August 2015 through January 2021, SA Kochan was assigned to the Human Trafficking and Human Smuggling Investigations Group in Dallas, Texas, where he was a member of the North Texas Trafficking Task Force. SA Kochan has been the lead investigative agent in more than 75 sex trafficking investigations. He has interviewed more than 100 adult and minor victims of sex trafficking.

In 2013, SA Kochan presented at the Maryland Governor's Human Trafficking Conference on the topic of transnational street gangs and their involvement in sex

¹ The government expects most of SA Kochan's testimony to be lay-witness testimony; however, it provides notice in an abundance of caution.

trafficking. In 2017, SA Kochan presented at the Crimes of Violence Conference in Fort Worth, Texas on the topic of sex trafficking and its links to violent criminal street gangs. In 2018, SA Kochan presented a case study entitled “Pollywood Crips” at the Crimes Against Women Conference in Dallas, Texas, and at the Street Gangs Conference in San Antonio, Texas. He has testified as an expert witness in multiple sex trafficking cases, including in the Northern District of Texas and the Western District of Oklahoma.

SA Kochan has testified in an expert capacity in the following trials in the past four years:

- *United States v. Allen Nash* (Northern District of Texas)
- *United States v. William Jonathan Smith* (Northern District of Texas)
- *United States v. Herman Sanders et al.* (Northern District of Texas)
- *United States v. Howard Sanford Williams* (Northern District of Texas)
- *United States v. Germain Coulter Senior* (Western District of Oklahoma)

SA Kochan will testify about his background and experience, particularly as a case agent in sex-trafficking investigations. Additionally, the government expects him to testify about:

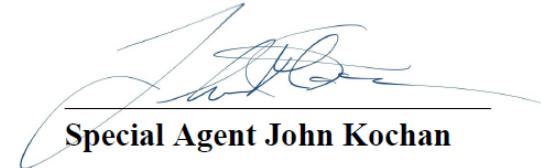
- the meaning of certain terms commonly used in the commercial sex trade, such as pimp, trick, trap, out of pocket, band, stack, rack, knock, track, blade, queen, king, family, daddy, renegade, dates, plays, fag, bm, square, fw, hoe, household, fwm, the game, following instructions, staying in pocket, fee, choose up, the concrete, walk, dry, break, laws, turn out, lace, green, p;
- the practices, tools, and methods commonly used by sex traffickers, including the use of social media websites to recruit sex trafficking victims;

- the methods of control, persuasion, and coercion commonly used by sex traffickers, including violence, threats of violence, charm, false promises of a better life, and romance;
- the different types of pimps, including finesse pimps and gorilla pimps;
- patterns of conversation between pimps and their victims, including the cycle of romantic messages and messages conveying a “team mentality” to coercive messages;
- pimps’ use of quotas for their victims;
- pimps’ provision of directions to victims to ensure profit is maximized;
- pimps’ tendencies to isolate victims from their families and to prey on vulnerable women;
- the tools and methods commonly used to promote commercial sex, including the use of the internet and commercial sex websites; and
- typical information and language contained in commercial sex advertisements.

SA Kochan is also expected to review written communications between Settle and AV1, as well as sex-trafficking advertisements, to explain their meaning based on his training and experience and discuss how these materials are consistent with human trafficking. He also may review photographs and transactions to provide context and explain their relevance to sex trafficking.

[No further information on this page.]

Below, SA Kochan has provided his signature to indicate that he has reviewed the above statement.



Special Agent John Kochan

3. Michael Freeman
Dallas Police Department
Dallas, Texas

Senior Criminal Intelligence Analyst Michael Freeman has been a Dallas Police Department officer since 1995. As a police officer, he has worked on a variety of cases, including those involving human and sex trafficking. Officer Freeman is a Senior Criminal Intelligence Analyst, where he uses his training and experience to forensically analyze digital evidence, including cellular telephones and other electronic devices.

Officer Freeman performed the forensic download and analysis of AV1's iPhone 7 cellular telephone bearing IMEI 354911097325005. *See GX5–9.* Mr. Freeman is specially trained to conduct forensic analysis of computers, networks, and other electronic devices. He is expected to testify as to the methodology and procedures used to extract and download information from the cellular telephone listed above. His expert opinions are based on his training and experience and on well-established principles of cellular telephone extraction.

[No further information on this page.]

Request for Notice of Defense Expert Witnesses

This Notice of Expert Witnesses also serves as the government's request for notice of expert testimony by the defendant pursuant to Federal Rule of Criminal Procedure 16. Specifically, the government requests that the defendant timely disclose a written summary of any testimony that the defendant intends to present at trial pursuant to Federal Rules of Evidence 702, 703, or 705.

Respectfully submitted,

LEIGHA SIMONTON
UNITED STATES ATTORNEY

/s/ Myria Boehm
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CERTIFICATE OF SERVICE

I hereby certify that on October 6, 2023, I electronically filed the foregoing document with the clerk for the United States District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system will send a “Notice of Electronic Filing” to the attorney of record who has consented in writing to accept this Notice as service of this document by electronic means.

/s/ Andrew Briggs

Andrew Briggs
Assistant United States Attorney